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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
REGINALD THOMAS,
Defendant.

CASE NO. 2:20-CR-012-MCE
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER
DATE: July 1, 2021
TIME: 10:00 a.m.
COURT: Hon. Morrison C. England, Jr.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on July 1, 2021.

2. By this stipulation, defendant now moves to continue the status conference until September 30, 2021, and to exclude time between July 1, 2021, and September 30, 2021, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes numerous reports and related documents, photographs, audio recordings, and videos. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Upon defendant's request, new counsel for the defendant was appointed on June 22, 2021. This is the second time new counsel has been appointed for the defendant. Counsel for defendant desires additional time to conduct investigation and research related to the charges, review discovery for this matter, to discuss potential resolutions with his client, and to otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of July 1, 2021 to September 30, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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7 Dated: June 29, 2021

McGREGOR W. SCOTT
United States Attorney

8 _____
9 /s/ TANYA B. SYED
10 TANYA B. SYED
11 Assistant United States Attorney

12 Dated: June 29, 2021

13 _____
14 /s/ ETAN ZAITSU
15 ETAN ZAITSU
16 Counsel for Defendant
17 REGINALD THOMAS

18 **ORDER**

19 IT IS SO ORDERED.

20 Dated: July 2, 2021

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22 _____
23 MORRISON C. ENGLAND, JR.
24 SENIOR UNITED STATES DISTRICT JUDGE